CRYSTAL OCEAN SEAFOOD, INC.

FOOT OF 39TH STREET () 6 () **2**.O: **B**OX **A A 9** :02 ASTORIA, OR 97103

TELEPHONE: (503) 325-3001 FAX: (503) 325-3233

May 5, 1999

Dockets Management Branch HFA-305 FDA 5630 Fishers Kane, Room 1061 Rockville, MD 20852

Subject: DI SJUNCTIVE LABELING

We understand that the FDA is currently accepting comments on the use of "and/or" labeling. As a processor of Surimi ingredients we were concerned about the current regulations that would identify water as the principle ingredient when more than one species of fish is used. Water is not the No. # 1 ingredient... the No. # 1 ingredient is fish.

As an option we believe a more appropriate identification would be as follows; Fish (may contain one or more of the following......)50%, water 30% and other ingredients 20%.

In the Surimi business Pollack and Whiting are available at different times during the year. If we differentiate between species as an example the label would read that water is the principle ingredient which it is not. The number one ingredient is fish.

Please consider our request.

Frank Karff

Sincerely,

Frank Kauffmann

President-Crystal Ocean Seafood

98P-6968

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CRYSTAL OCEAN SEAFOOD, INC. FOOT OF 39TH PO BOX 1130 ASTORIA, OR 97103





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